Ryan Dolan rdolan@gerardfoxlaw.com

January 9, 2023

VIA NYSCEF

Hon. Sarah L. Cave United States Courthouse 40 Foley Square New York, NY 10007

Re: Shahidi v. Robinette et al.

Dear Judge Cave,

Defendants Todd Kulkin and Law Offices of Todd Kulkin P.C.'s letter-motion seeking to adjourn the settlement conference scheduled for Wednesday, January 11, 2023 at 2:30 p.m. is GRANTED, and the settlement conference is ADJOURNED sine die.

SO ORDERED 01/10/23

SARAH L. CAVE United States Magistrate Judge

I am writing to you to you, after speaking with counsel Eden Quainton and Matt Farmer, with respect to the upcoming settlement conference scheduled for January 11, 2023. I am seeking an adjournment pursuant to Paragraph 9 of Your Honor's Standing Order Applicable to Settlement Conferences.

In his settlement materials submitted last week, Plaintiff's counsel indicated he intends to file an amended complaint by January 12, 2023. Plaintiff's counsel further noted that he intended to raise new theories of liabilities towards defendants, including Defendant's Todd Kulkin and Law Offices of Todd Kulkin, P.C. Given that the parties had only prepared for settlement discussions based upon allegations contained within the current complaint, I believe an adjournment is appropriate until after the complaint is filed and parties have had sufficient time to review the new materials. Indeed, I believe this satisfies the cause requirement under Paragraph 9(a), which states that "parties are required to seek an adjournment if...an adjournment would permit discovery or exchange of information that would make the conference more fruitful...."

I have spoken with Chambers and received alternative dates. After consulting with opposing counsel and our clients, all parties have agreed to the proposed date of Thursday, February 9th.

Best Regards,

Ryan Dolan